

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

SHANEY FREEMANTLE-BRACKETT,

Plaintiff,

v.

LVNV FUNDING, LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
EQUIFAX INFORMATION SERVICES,
LLC; TRANSUNION, LLC; JACOB LAW
GROUP, PLLC; RESURGENT CAPITAL
SERVICES, L.P.; and MARLETTE
FUNDING, LLC DBA BEST EGG.,

Defendants.

Case No. 1:25-cv-00072-TBM-RPM

Hon. Judge Taylor B. McNeel

Magistrate Judge Robert P. Myers, Jr.

**DEFENDANTS' RESURGENT CAPITAL SERVICES L.P. AND LVNV FUNDING LLC'S
MOTION FOR EXTENSION OF TIME TO MOVE FOR LEAVE TO
FILE THIRD PARTY CLAIMS**

Defendants Resurgent Capital Services L.P. ("Resurgent") and LVNV Funding LLC ("LVNV") (collectively, the "Defendants"), by and through undersigned counsel, respectfully request that this Court grant them a fourteen (14) day extension of time, up to and including July 16, 2025, to move for leave to file any potential third party claims against Defendant Marlette Funding, LLC d/b/a Best Egg ("Best Egg"). In support thereof, Defendants state as follows:

1. On June 18, 2025, this Court entered a Minute Entry pursuant to the Telephonic Case Management Conference which also occurred on June 18, 2025. In this Court's Minute Entry, they permitted Defendants up to and through July 2, 2025 to move for leave to assert a claim against Best Egg.

2. The parties are currently engaged in settlement negotiations and are increasingly optimistic that a global resolution can occur without the parties having to incur potentially

unnecessary legal fees, including fees related to any future third party claim asserted by Defendants.

3. Accordingly, Defendants respectfully request an extension of time of fourteen (14) days, up to and including July 16, 2025 by which to file any motion for leave to file a claim against Best Egg.

4. This motion is made for good cause, not meant for purposes of unnecessary delay, and will not prejudice any party in the litigation.

5. In anticipation of filing this motion, the Defendants' counsel attempted to confer with Plaintiff's counsel, Michael T. Ramsey, regarding the relief sought herein. As of the time of this filing, Defendants' counsel has not received a response from Mr. Ramsey as to whether Plaintiff opposes the requested extension.

WHEREFORE, Defendants LVNV Funding LLC and Resurgent Capital Services L.P. respectfully request that this Honorable Court grant them an extension of time, up to and including July 16, 2025, to file a motion for leave to file a claim against Defendant Marlette Funding, LLC d/b/a Best Egg, and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted this 2nd day of July, 2025.

/s/ R. Frank Springfield

R. Frank Springfield (MSB #100518)

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Attorney for Defendants

LVNV FUNDING LLC AND

RESURGENT CAPITAL SERVICES L.P.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was electronically filed on July 2, 2025 with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all registered attorneys of record.

/s/ R. Frank Springfield

OF COUNSEL